REMARKS

The Examiner is thanked for the careful examination of the present application. Independent Claims 1, 12, 18, 24, and 28 have been amended to more clearly define over the prior art. In view of the amendments and arguments presented below, it is submitted that all claims are patentable.

I. The Amended Claims

Amended independent Claim 1 recites a communications system comprising a plurality of data storage devices, each using at least one of a plurality of operating protocols, at least one data storage device communicating using multiple operating protocols. A plurality of mobile wireless communications devices are for accessing the at least one data storage device, each mobile wireless communications device communicating using at least one of the plurality of operating protocols. The communications system also includes a protocol interface device comprising a front-end proxy module for communicating with the plurality of mobile wireless communications devices using respective operating protocols.

The protocol interface device also includes a protocol engine module for communicating with the plurality of data storage devices using respective operating protocols determining whether a given data storage device of the plurality thereof communicates using multiple operating protocols. The protocol engine module selects a single supported operating protocol for communicating with the given data storage device of the plurality

13

thereof if only a single operating protocol is supported thereby,
and selects a desired operating protocol for communicating with
the given data storage device of the plurality thereof from the
multiple operating protocols if multiple operating protocols are
supported thereby. The protocol engine module selects the desired
operating protocol based upon a ranking of the plurality of
operating protocols, the ranking being based upon a total number
of protocol-supported elements.

Amended independent Claim 12 is directed to the
protocol interface device of Claim 1. Amended independent Claim
18 is directed to a protocol interface device for interfacing a
plurality of communications devices with a plurality of data
storage devices, and contains similar recitation to independent
Claim 1. Amended independent Claim 24 is a method counterpart to
amended independent Claim 12. Amended independent Claim 28 is a
computer readable medium counterpart to amended independent Claim
12.

II. The Amended Claims Are Patentable

The Examiner rejected independent Claims 1, 12, 18,
and 24 over the combination of Poor et al., Marl et al., and
Natarajan. Poor et al. discloses an intermediate server or system
having knowledge of application program protocols used by the
application programs on a user's wireless device. The
intermediate server receives information communicated from the
device via a transport level protocol. This information is
subsequently transmitted by the intermediate server to a remote
server or system that services the application or program in use

14

by that person, in accordance with the appropriate single communication protocol used by that remote server or system.

Marl et al. was cited for the general concept of determining whether an e-mail server is compatible with multiple protocols. Natarajan et al. was cited for the general concept of selecting a protocol when a server supports multiple protocols. In particular, Natarajan was cited as disclosing the claimed element (recited in independent Claim 1) of the protocol engine module selecting the desired operating protocol based upon a ranking of the plurality of operating protocols, the ranking being based upon a number of protocol-supported elements. The Examiner stated that he considered the user selection of desired protocol-supported elements to disclose the ranking of a plurality of operating protocols based upon a number of protocol-supported elements. In particular, the Examiner stated that "if one checks the 'always secure' feature, the protocols that are secure are ranked above those protocols that are not secure, like-wise with the proxy feature, when that option is chosen, protocols that use proxies are thus ranked over other protocols that do not support proxies. In these cases, the 'number of protocol-supported elements' would be 'security' and 'proxies' respectively."

Independent Claim 1 has been amended to recite the protocol engine module selecting the desired operating protocol based upon a ranking of the plurality of operating protocols, the ranking being based upon a <u>total number of protocol-supported</u>

15

elements. Col. 3, lines 49-58 of Natarajan, cited by the
Examiner, are reproduced below for the Examiner's convenience.

> If the user wants to specify that
> certain protocol be used under certain
> circumstances, the user sets the
> configuration 26 at the client. The
> configuration includes properties that relate
> to the use of the protocols. The user
> specifies how the protocols should be used by
> setting these properties in the
> configuration. For example, if the user wants
> to specify that all communications must be
> transmitted over a secure protocol, the user
> sets the always_secure property. Another
> property, called always_proxy, indicates that
> all communications must pass through the
> gateway.

This cited portion of Natarajan does not disclose
ranking a plurality of operating protocols based upon a total
number of protocol-supported elements. Rather, this is the
selection of protocols based upon a user preference for the use
of a certain protocol under a certain circumstance, and not based
upon a total number of protocol-supported elements. A user
indicating a preference for a certain protocol in a certain
circumstances in no way discloses the ranking of protocols based
upon a total number of protocol-supported elements. When viewed
in this light, it can be seen that no fair reading of Natarajan
discloses the protocol engine module selecting the desired
operating protocol based upon a ranking of the plurality of
operating protocols, the ranking being based upon a total number
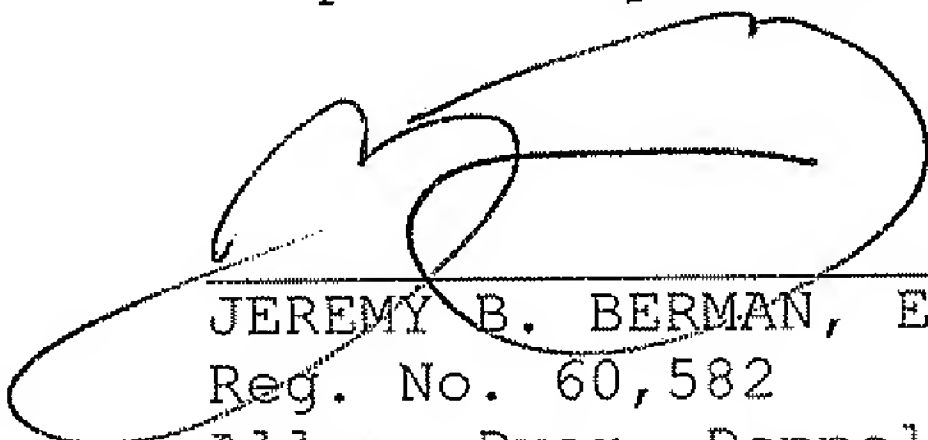of protocol-supported elements.

16

Since neither Poor et al. nor Marl et al. provide this critical deficiency of Natarajan, the combination of Poor et al., Marl et al., and Natarajan fails to disclose the protocol engine module selecting the desired operating protocol based upon a ranking of the plurality of operating protocols, the ranking being based upon a numeric value representing a total number of protocol-supported elements. Accordingly, independent Claim 1 is patentable over the combination of Poor et al., Marl et al., and Natarajan. Independent Claims 12, 18, and 24 contain similar recitations and are patentable for the same reason. The dependent claims, which recite yet further distinguishing details, are likewise patentable and require no further discussion herein.

In re Patent Application of:
ROY ET AL.
Serial No. **10/777,731**
Filed: **FEBRUARY 12, 2004**
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CONCLUSION

In view of the amendments and arguments provided herein, it is submitted that all the claims are patentable. Accordingly, a Notice of Allowance is requested in due course. Should any minor informalities need to be addressed, the Examiner is encouraged to contact the undersigned attorney at the telephone number listed below.

Respectfully submitted,

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18